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13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE EASTERN DISTRICT OF CALIFORNIA  
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17 UNITED STATES OF AMERICA, ) Case No. 2:22-cr-000151-WBS  
18 Plaintiff, )  
19 v. ) STIPULATION AND ORDER TO  
20 ) CONTINUE STATUS CONFERENCE AND  
21 ) EXCLUDE TIME  
22 JOSE CURIEL, ET AL )  
23 Defendants. ) Date: November 20, 2023  
24 ) Time: 9:00 a.m.  
25 ) Judge: Hon. William B. Shubb  
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28 **IT IS HEREBY STIPULATED**, by and between the parties, through their respective  
counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, Assistant Federal  
Defender Megan T. Hopkins, counsel for defendant Jose Curiel, and Clemente M. Jimenez,  
counsel for defendant Roberto Tostado-Cadenas, that the status conference scheduled for  
November 20, 2023, be continued to **January 22, 2024, at 9:00 a.m.**

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28 Defense counsel continues to review discovery and conduct investigation in this case.  
The parties anticipate an initial plea offer from the government prior to the next status  
conference, and will require additional time to review the offer with the defendants and respond  
to the government. The parties believe a continuance to January 22, 2024, will permit defense  
counsel the additional time necessary to conduct pretrial investigation, identify and interview  
witnesses, obtain pertinent records, and finalize any further pre-plea negotiations.

1           The parties agree that the ends of justice served by resetting the status conference date  
2 outweigh the best interest of the public and the defendant in a speedy trial. Therefore, the parties  
3 agree that time is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

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5           Dated: November 15, 2023

Respectfully submitted,

6           HEATHER E. WILLIAMS  
7           Federal Public Defender

8           */s/ Megan T. Hopkins*  
9           MEGAN T. HOPKINS  
10           Assistant Federal Defender  
11           Attorney for Defendant  
12           JOSE CURIEL

13

14           Dated: November 15, 2023

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16           */s/ Clemente M. Jimenez*  
17           CLEMENTE M. JIMENEZ  
18           Attorney for Defendant  
19           ROBERTO TOSTADO-CADENAS

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21           PHILLIP A. TALBERT  
22           United States Attorney

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24           Dated: November 15, 2023

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26           */s/ Justin Lee*  
27           JUSTIN LEE  
28           Assistant United States Attorney  
              Attorney for Plaintiff

## ORDER

**IT IS HEREBY ORDERED** that the status conference scheduled for November 20, 2023, at 9:00 a.m. is continued to **January 22, 2024, at 9:00 a.m.** The time period through January 22, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: November 15, 2023

William W. Shubbe

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## WILLIAM B. SHUBB

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UNITED STATES DISTRICT JUDGE